IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

PROMISE HEALTHCARE GROUP, LLC, et al.,

Case No. 18-12491 (CSS)

Debtors.¹

(Jointly Administered)

PROMISE HEALTHCARE, INC., BOSSIER LAND ACQUISITION CORP., PROMISE HEALTHCARE OF LOUISIANA, INC., AND PROMISE PROPERTIES OF SHREVEPORT, LLC,

Adv. Proc. No. 19-50776 (CSS)

Plaintiffs,

Re: Adv. D.I. 49, 50, 55 and 61

v.

KPC PROMISE HEALTHCARE, LLC and STRATEGIC GLOBAL MANAGEMENT, INC.,

Defendants.

NOTICE OF WITHDRAWAL OF DEFENDANTS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM NON-PARTIES MARK TRESS, HANCOCK WHITNEY BANK AND LEXMARK HOLDINGS LLC

¹ The Debtors in these Chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: HLP HealthCare, Inc. (8381), PH-ELA, Inc. (9180), Professional Rehabilitation Hospital, L.L.C. (5340), Promise Healthcare #2, Inc. (1913), Promise Healthcare Group, LLC (1895), Promise Healthcare Holdings, Inc. (2601), Bossier Land Acquisition Corp. (6644), HLP of Los Angeles, LLC (9102), HLP of Shreveport, Inc. (1708), HLP Properties at The Villages Holdings, LLC (0006), HLP Properties at the Villages, L.L.C. (1938), HLP Properties of Vidalia, LLC (4255), HLP Properties, Inc. (0068), Promise Healthcare of California, Inc. (9179), Promise Healthcare, Inc. (7953), Promise Hospital of Ascension, Inc. (9219), Promise Hospital of Baton Rouge, Inc. (8831), Promise Hospital of Dade, Inc. (7837), Promise Hospital of Dallas, Inc. (0240), Promise Hospital of East Los Angeles, L.P. (4671), Promise Hospital of Florida at The Villages, Inc. (2171), Promise Hospital of Louisiana, Inc. (4886), Promise Hospital of Lee, Inc. (8552), Promise Hospital of Overland Park, Inc. (5562), Promise Hospital of Phoenix, Inc. (1318), Promise Hospital of Salt Lake, Inc. (0659), Promise Hospital of Vicksburg, Inc. (2834), Promise Hospital of Wichita Falls, Inc. (4104), Promise Properties of Dade, Inc. (1592), Promise Properties of Lee, Inc. (9065), Promise Properties of Shreveport, LLC (9057), Promise Skilled Nursing Facility of Overland Park, Inc. (5752), Promise Skilled Nursing Facility of Wichita Falls, Inc. (1791), Quantum Health, Inc. (4298), Quantum Properties, L.P. (8203), St. Alexius Hospital Corporation #1 (2766), St. Alexius Properties, LLC (4610), Success Healthcare 1, LLC (6535), Success Healthcare 2, LLC (8861), Success Healthcare, LLC (1604), Vidalia Real Estate Partners, LLC (4947), LH Acquisition, LLC (2328), Promise Behavioral Health Hospital of Shreveport, Inc. (1823), Promise Rejuvenation Centers, Inc. (7301), Promise Rejuvenation Center at the Villages, Inc. (7529), and PHG Technology Development and Services Company, Inc. (7766). The mailing address for the Debtors, solely for purposes of notices and communications, is c/o FTI Consulting, Inc., 50 California Street, Suite 1900, San Francisco, CA 94111.

PLEASE TAKE NOTICE that Defendants KPC Promise Healthcare, LLC and Strategic Global Management, Inc., by their undersigned counsel, hereby withdraw their Motion to Compel Production of Documents From Non-Parties Mark Tress, Hancock Whitney Bank and Lexmark Holdings LLC [Adv. D.I. 49] without prejudice.

Dated: November 15, 2020 Wilmington, Delaware

BARNES & THORNBURG, LLP

/s/ Thomas E. Hanson, Jr.

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-and-

BUCHALTER, A Professional Corporation

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